

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

FILED
RICHARD W. NAGEL
CLERK OF COURT

2015 MAY -7 PM 1:00

U.S. DISTRICT COURT
SOUTHERN DIST OHIO
WEST DIV CINCINNATI

UNITED STATES OF AMERICA	:	Case No. 1:15-CR-012
	:	Senior Judge Sandra Beckwith
	:	
v.	:	SUPERSEDING INDICTMENT
	:	
	:	18 U.S.C. § 373
CHRISTOPHER CORNELL	:	18 U.S.C. § 924(c)
(a/k/a Raheel Mahrus Ubaydah)	:	18 U.S.C. § 1114
	:	18 U.S.C. § 2339B

The Grand Jury alleges the following:

COUNT 1
(Attempted Murder of Government Employees and Officials)
18 U.S.C. § 1114

1. On or about August 2014 through and including January 14, 2015; in the Southern District of Ohio and elsewhere, defendant **CHRISTOPHER CORNELL**, did attempt to unlawfully kill officers and employees of the United States while such officers and employees of the United States were engaged in and on account of the performance of their official duties, specifically, by attempting to attack the United States Capitol Building and kill officers and employees of the United States.

All in violation of Title 18, United States Code, Section 1114.

COUNT 2
(Solicitation to Commit a Crime of Violence)
18 U.S.C. § 373

2. On or about August 2014 through and including January 14, 2015, in the Southern District of Ohio and elsewhere, defendant **CHRISTOPHER CORNELL**, with

intent that another person engage in conduct constituting a felony that has as an element the use, attempted use, or threatened use of physical force against property or against the person of another in violation of the laws of the United States, and under circumstances strongly corroborative of that intent, solicited, commanded, induced, and otherwise endeavored to persuade such other person to engage in such conduct, specifically, the killing of officers and employees of the United States, in violation of Title 18, United States Code, Section 1114.

All in violation of Title 18, United States Code, Section 373.

COUNT 3

**(Possession of Firearm in Furtherance of Attempted Crime of Violence)
18 U.S.C. § 924(c)**

3. On or about January 14, 2015, in the Southern District of Ohio and elsewhere, defendant **CHRISTOPHER CORNELL** did knowingly possess a firearm, that is, two Armalite Inc., Model M-15, 5.56mm, semi-automatic rifles (Serial numbers MS000788B and MS000974A) and approximately 600 rounds of ammunition, in furtherance of an attempted crime of violence for which he may be prosecuted in a court of the United States, that is the attempted killing of officers and employees of the United States, in violation of Title 18, United States Code, Section 1114.

All in violation of Title 18, United States Code, Section 924(c).

COUNT 4

**(Material Support to Designated Foreign Terrorist Organization)
18 U.S.C. § 2339B**

4. On or about August 2014 through and including January 14, 2015, in the Southern District of Ohio, the defendant, **CHRISTOPHER CORNELL**, a citizen of the

United States, did knowingly attempt to provide material support and resources, including personnel (specifically himself) and services, to a foreign terrorist organization, namely the Islamic State of Iraq and the Levant, knowing that the organization was a designated terrorist organization and that the organization had engaged in and was engaging in terrorist activity and terrorism.

All in violation of Title 18, United States Code, Section 2339B.

FORFEITURE ALLEGATION

5. The allegations contained in Count 3 of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c).
6. Upon conviction of the offense in violation of Title 18, United States Code, Section 924(c) set forth in Count 3 of this Indictment, the Defendant, **CHRISTOPHER CORNELL**, shall forfeit to the United States pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c), any firearms and ammunition involved in the commission of the offense, including, but not limited to: two Armalite Inc., Model M-15, 5.56mm, semi-automatic rifles (Serial numbers MS000788B and MS000974A) and approximately 600 rounds of ammunition.
7. If any of the property described above, as a result of any act or omission of the defendant:
 - a. cannot be located upon the exercise of due diligence;
 - b. has been transferred or sold to, or deposited with, a third party;

- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

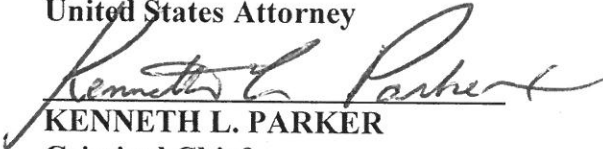
All pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c).

A TRUE BILL.



Grand Jury Foreperson

CARTER M. STEWART
United States Attorney



KENNETH L. PARKER
Criminal Chief